

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

°SACR14-00023

UNITED STATES OF AMERICA,

No. SA CR 14-

Plaintiff,

I N F O R M A T I O N

v.

[29 U.S.C. § 439(b): False Statement in Financial Report of Labor Union]

Defendant.

Class A Misdemeanor

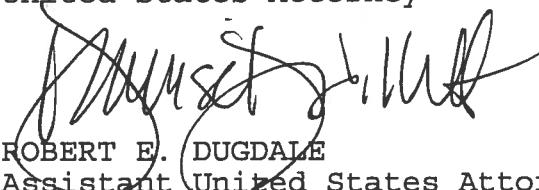
The United States Attorney charges:

[29 U.S.C. § 439(b)]

20 On or about March 29, 2010, in Orange County, within the
21 Central District of California, and elsewhere, defendant RYAN W.
22 SHERARD ("SHERARD"), while an officer of the International
23 Brotherhood of Teamsters, Graphic Communications Conference,
24 District Council No. 2 ("the union"), namely, the President, made
25 and caused to be made a false statement and representation of
26 material fact, knowing it to be false, in a report and document
27 required to be filed by the union with the Secretary of Labor
28 pursuant to Section 431 of Title 29, United States Code, that is,

1 the Department of Labor ("DOL") Form LM-2, "Labor Organization
2 Annual Report," for calendar year 2009, in that defendant SHERARD
3 entered "\$0" for himself in Column G of Schedule 11 of the DOL Form
4 LM-2 for the union, when, in truth and in fact, as defendant SHERARD
5 well knew, that response was a false material statement because
6 defendant SHERARD had received allowances and other disbursements of
7 approximately \$9,635 for calendar year 2009 that were not otherwise
8 reported on the Form LM-2 for the union.

9 ANDRÉ BIROTTÉ JR.
10 United States Attorney

11 
12 ROBERT E. DUGDALE
13 Assistant United States Attorney
Chief, Criminal Division

14 DENNISE D. WILLETT
15 Assistant United States Attorney
Chief, Santa Ana Branch Office

16 CHARLES E. PELL
17 Assistant United States Attorney
Santa Ana Branch Office